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June 23, 2022

**MEMO ENDORSED**

**VIA ECF**

Hon. Edgardo Ramos  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Palo Alto Networks, Inc. v. Taasera Licensing LLC and Quest Patent Research Corporation*, No. 1:22-cv-02306-ER

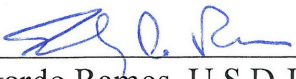
Dear Judge Ramos:

This firm represents Plaintiff Palo Alto Networks, Inc. ("PAN") in the above captioned action. We are writing to request a stay of our opposition to Defendants' Motions to Dismiss pending jurisdictional discovery. The parties appeared before the Court last Thursday for the pre-motion conference on Defendants' Motions to Dismiss, and in accordance with the Court's order during that conference, PAN has submitted a cross-motion seeking jurisdictional discovery. We propose that the jurisdictional discovery be completed within 3 months, and that PAN have the standard 14 calendar days to respond after that. *See* Local Civil Rule 6.1. *See, e.g., Blockchain Mining Supply & Servs. Ltd. v. Super Crypto Mining, Inc.*, No. 18-cv-11099-ALC, 2020 WL 7128968, at \*2 (S.D.N.Y. Dec. 4, 2020) (Court providing plaintiff four months to conduct jurisdictional discovery, and requesting a briefing schedule subsequent to completion of jurisdictional discovery).

Very truly yours,

/s/ Krishnan Padmanabhan  
Krishnan Padmanabhan

Plaintiff Palo Alto Networks, Inc.'s request for a stay of its opposition to the defendants' motions to dismiss pending jurisdictional discovery is DENIED. The parties are instructed to follow the briefing schedule directed by the Court during the pre-motion conference held on June 16, 2022: motions due 6/23/2022; responses due 7/14/2022; replies due 7/21/2022. It is SO ORDERED.

  
\_\_\_\_\_  
Edgardo Ramos, U.S.D.J.  
Dated: June 24, 2022  
New York, New York